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C H A N C E

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Hon. Frank Maas  
United States Magistrate Judge  
Southern District of New York  
Daniel P. Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

June 30, 2015

**Re: In re Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD/FM)**

Dear Judge Maas:

The Defendants' Executive Committee, on behalf of the Defendants who are currently before this Court in merits discovery, respectfully requests a 45 day extension of the current July 30, 2015 deadline for Plaintiffs and all Defendants engaged in merits discovery to submit amended Initial Disclosures pursuant to Rule 26(a)(1) (Dkt. # 2957), in light of current and ongoing religious holidays including Ramadan and Eid, which take place from June 17 to July 18, 2015.

Defendants' Executive Committee has met and conferred with the Plaintiffs' Executive Committees on this matter, and Plaintiffs have consented to the requested extension.

We respectfully request a revised deadline for Plaintiffs and all Defendants engaged in merits discovery to provide supplemental witness list information by September 15, 2015.

Sincerely,

  
Roni Bergoffen

cc: Hon. George B. Daniels  
Counsel of Record (by ECF)